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12 Attorneys for Defendants

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17
18 YOLANDA TREJO, Individually and on Behalf
of Herself and All Others Similarly Situated,

19 Plaintiff,

20 v.

21 SONY COMPUTER ENTERTAINMENT
22 AMERICA LLC, SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,
23 and SONY NETWORK ENTERTAINMENT
AMERICA INC.,

24 Defendants.

Case No. 3:11-cv-02408-EMC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT ; ORDER**

Judge: Hon. Edward M. Chen

25
26
27 WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA") (f/k/a
28 Sony Computer Entertainment America, Inc.) and Sony Network Entertainment Internatioal

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 3:11-cv-02408-EMC

1 LLC ("SNEI"), as well as certain related entities (collectively, the "Sony Defendants"), have
2 been named as defendants in at least twenty-five (25) putative class action lawsuits within this
3 District, to date;

4 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
5 least nineteen (19) putative class action lawsuits pending outside this District, to date;

6 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
7 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed
8 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,
9 2011.

10 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
11 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
12 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
13 JPML;

14 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
15 by and through their respective counsel, hereby stipulate as follows:

16 The deadline for the defendants to respond to the Complaint in the above-captioned action
17 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
18 litigation centralizing the above-captioned action with other matters, or if centralization is denied
19 by the JPML, then 30 days from the date of such order denying centralization.

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1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 27, 2011

PETER S. PEARLMAN
COHN LIFLAND PEARLMAN HERRMANN
& KNOPF LLP

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6 By: /s/ Peter S. Pearlman /s/ [as authorized]
Peter S. Pearlman
Attorneys for Plaintiff
7 YOLAND TREJO

8
9 Dated: May 27, 2011

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THAD A. DAVIS
ROCKY C. TSAI
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10
11 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

12
13 Attorneys for Defendants
SONY COMPUTER
14 ENTERTAINMENT AMERICA LLC,
SONY NETWORK ENTERTAINMENT
15 INTERNATIONAL LLC,
SONY NETWORK ENTERTAINMENT
16 AMERICA INC.

17 **[~~PROPOSED~~] ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: June 1, 2011

21 By: _____

